

Beth E. Levine, Esq.
Andrew W. Caine, Esq. (admitted *pro hac vice*)
Jason S. Pomerantz, Esq. (admitted *pro hac vice*)
PACHULSKI STANG ZIEHL & JONES LLP
780 Third Avenue, 34th Floor
New York, New York 10017
Telephone: (212) 561-7700
Facsimile: (212) 561-7777
Email: blevine@pszjlaw.com
acaine@pszjlaw.com
jspomerantz@pszjlaw.com

Counsel to Plaintiff Runway Liquidation, LLC

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

In re:

RUNWAY LIQUIDATION HOLDINGS, LLC, *et al.*,¹

Debtors.

RUNWAY LIQUIDATION, LLC,

Plaintiff,

v.

COLLECTION XIIX, LTD.,

Defendant.

Chapter 11

Case No. 17-10466 (SCC)

(Jointly Administered)

Adv. Proc. No. 19-01039 (SCC)

STIPULATION EXTENDING TIME TO ANSWER COMPLAINT

Plaintiff, Runway Liquidation, LLC (“Plaintiff”) and defendant, Collection XIIX,

¹ A list of the Post-Effective Date Debtors in these chapter 11 cases, along with the last four digits of each Post-Effective Date Debtor’s federal tax identification number include: Runway Liquidation Holdings, LLC (6857); Runway Liquidation, LLC (5942); Runway Liquidation Intermediate Holdings, LLC (3673); MR Liquidation, LLC (9200); and MMH Liquidation, LLC (3854).

Ltd. ("Defendant"), by and through their undersigned attorneys, hereby stipulate and agree as follows:

WHEREAS, on February 26, 2019, Plaintiff filed a complaint (the "Complaint") against Defendant;

WHEREAS, the summons (the "Summons") was issued on February 27, 2019; and

WHEREAS, on March 8, 2019, Defendant was served with the Summons and Complaint;

The parties hereby stipulate and agree to the matters set forth below:

1. The time by which Defendant is required to answer the Complaint is extended through and including May 20, 2019.
2. Defendant does not challenge personal jurisdiction and waives any objection to service of process of the summons and complaint in this adversary proceeding.

Dated: March 29, 2019

Dated: March 29, 2019

PACHULSKI STANG ZIEHL & JONES LLP
Counsel to Plaintiff, Runway Liquidation, LLC

~~GROUP L~~ CONSULTING
Counsel for Collection XIII, Ltd.

By: /s/ Beth E. Levine
Beth E. Levine, Esq.
Andrew W. Caine, Esq. (admitted
pro hac vice)
Jason S. Pomerantz, Esq. (admitted
pro hac vice)
780 Third Avenue, 34th Floor
New York, NY 10017
Tel.: (212) 561-7700
Fax: (212) 561-7777
Email: blevine@pszjlaw.com
acaine@pszjlaw.com
jspomerantz@pszjlaw.com

By: 
Michael Lichtenstein
420 Lexington Ave, Room 300
New York, NY 10170-0399
Telephone: (212) 297-6147
Email: group1consulting@gmail.com